

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
)	
v.)	Criminal No. 15-CR-10147
)	
LARRY BAILEY)	

ASSENTED TO MOTION TO ADVANCE AND CONTINUE
RULE 11 HEARING

Now comes the defendant, Larry Bailey, and respectfully requests that this Honorable Court grant a continuance of his Rule 11 hearing currently scheduled for June 3, 2016 at 3:00pm. As reasons thereof, Bailey states the following:

1. Counsel for Bailey is scheduled to begin a homicide trial in Suffolk Superior Court on May 25, 2016 in Commonwealth v. Omar Denton, SURCR2014-10109.
2. The case is a four co-defendant custody case, and the trial is scheduled to last approximately four weeks.
3. Due to the Memorial Day holiday, the schedules of the seven attorneys involved in the case and the court, the parties cannot sit for at least three of the trial dates. As such, the trial judge will not release the parties for any other matters while the jury is sitting because some attorneys have vacations scheduled at the end of June.
4. As a result, counsel is not available to attend the Rule 11 hearing currently scheduled for June 3, 2016.
5. Counsel is scheduled to go on vacation immediately after the trial in Commonwealth v. Denton is completed, and once she returns from vacation, she is scheduled to begin a homicide trial in Plymouth Superior Court in Commonwealth v. Gai Scott,

PLCR2014-0419. As such, counsel requests that this Court reschedule the hearing for a date in August.

6. The Government assents to this motion.

For all the foregoing reasons, Larry Bailey respectfully requests that this Honorable Court continue the Rule 11 hearing from June 3, 2016 to a date in August that is agreeable with the Court.

Respectfully Submitted,
LARRY BAILEY,
By his attorney,

/s/ Rosemary Scapicchio
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CERTIFICATE OF SERVICE

I hereby certify that a true copy of the above document was served upon the attorney of record for each party and upon any party appearing pro se by complying with this Court's directives on electronic filing.

Dated: May 19, 2016

Signed: /s/ Rosemary Scapicchio